

10/10/06

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PROGRESS REPORT NO. 3

TO: Kevin Rochlin – U.S. Environmental Protection Agency (EPA), Region 10 (via Email)
Sally Thomas – EPA, Region 10 (via Email)
Monica Tonel – EPA, Region 10 (via Email)

FROM: Marko Adzic – Teck Cominco American Incorporated (TCAI)

CC: David Godlewski – TCAI (via Email)
David Charters – EPA, Headquarters (via Email)

DATE: October 10, 2006

RE: Upper Columbia River Remedial Investigation/Feasibility Study (RI/FS) - Progress Report No. 3: Month Ending September 2006

Pursuant to Paragraph 39 of the June 2, 2006 Settlement Agreement (Agreement), the following is intended to provide a summary of the activities completed during the past month in compliance with the aforementioned Agreement. In addition, it is also intended to provide a summary of proposed activities to be carried out within the coming months.

**Table 1. Upper Columbia River Remedial Investigation/Feasibility Study
Summary of On-Going and Planned Activities**

Task Description	Status	Issues	Estimated Completion Date
2005 Field Data Transfer	Complete	Error identified within reconstructed whole body concentrations	July 31, 2006
Technical Memorandum ¹	On-going	None to report at this time	October 30, 2006
Draft RI/FS Work Plan	On-going	None to report at this time	December 28, 2006
Sampling and Analysis Plan(s)	On-going	None to report at this time	February 26, 2007
Health and Safety Plan	On-going	None to report at this time	February 26, 2007

Notes: 1. As outlined within the Agreement the technical memorandum will outline and described the Risk-Based Remedial Objectives for the Ecological Risk Assessment.

Based on a review of the most recent fish tissue database made available for download on September 1, 2006, TCAI identified an inconsistency between reconstructed whole body analyte concentrations. Based on subsequent discussions with EPA's contractor, it would appear that the inconsistency is the result of misplaced parentheses within the database formula. The correct formula and that being employed by TCAI is illustrated within Equation 1.

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$$C_{wb} = \frac{[(C_f \times M_f) + (C_o \times M_o)]}{M_o + M_f} \quad \text{Equation 1}$$

Where:

C_{wb} = Whole body concentration
 C_f = Fillet concentration
 M_f = Mass of fillet
 C_o = Offal concentration
 M_o = Mass of offal

As indicated within Table 1 above, efforts to complete the technical memorandum on preliminary risk management-based action objectives (AOs) for ecological receptors are on-going. It is our understanding that similar risk management-based AOs for the protection of human health will be developed by EPA; but that at the time of writing, have not been initiated. In light of the schedule listed within Table 1, it is anticipated that AOs for the protection of human health will be developed in the near future such that they may be integrated into the draft RI/FS work plan being developed by TCAI. At this time, there is no reason to anticipate that the technical memorandum will not be completed on or before the due date listed within Table 1.

We wish to confirm that a draft version of the AOs will be presented to EPA and participating parties on the meeting scheduled at TCAI's Spokane office on October 17, 2006. We also wish to confirm that an invitation was sent to respective project managers, see Table 2 below, informing them of the meeting. The primary purpose of the aforementioned meeting is to introduce and discuss the preliminary risk management-based AOs, introduce the skeleton of the draft RI/FS work plan, and introduce for consideration anticipated 2007 field sampling program(s). It is important to note that the October 17th meeting is not intended to be technical in nature or an in-depth discussion of the draft work plan. Rather, it is intended to be an introductory meeting for participating parties and introduce the proposed path forward. A more detailed technical discussion of Phase 2 activities is anticipated in the first half of November 2006. The exact date and time will be further reviewed and discussed in association with EPA and participating parties.

**Table 2. Upper Columbia River Remedial Investigation/Feasibility Study
Summary of Participating Party Project Managers**

Name	Organization	Email
Kevin Rochlin	EPA, Region 10	rochlin.kevin@epa.gov
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Bruce Duncan	EPA, Region 10	duncan.bruce@epa.gov
Monica Tonel	EPA, Region 10	tonel.monica@epa.gov
David Charters	EPA, Headquarters	Charters.Davidw@epa.gov
Dan Audet	Department of Interior, National Park Service	daniel_audet@nps.gov
John Roland	State of Washington, Department of Ecology	jrol461@ecy.wa.gov
Randall Connolly	Spokane Tribe	connolly@spokanetribe.com
Patti Bailey	Colville Tribe	patti.bailey@colvilletribes.com
Gary Passmore	Colville Tribe	gary.passmore@colvilletribes.com

Efforts to complete the draft RI/FS work plan are on-going. In general, these activities include preparing a comprehensive review and summary of existing data in terms of physical and chemical characteristics for chemicals of potential concern; and their distribution within environmental media at the UCR site. This information will be used to assess, identify, and prioritize future (e.g., Phase 2) sampling events. Additional efforts towards completion of the draft RI/FS work plan at this time are focused on summarizing and setting forth a comprehensive description of physiographic, hydrologic, geologic and ecological characteristics of the UCR. It is anticipated that following a technical meeting in November 2006 with participating parties, details associated with items such as site conceptual model(s) and Phase 2 sampling activities will be further developed to facilitate completion of the draft RI/FS work plan and associated sampling plans.

Pursuant to Paragraph seven of the Agreement, TCAI has informed EPA of the addition of two new members to TCAI's technical team. They include Mr. David V. Ellis of Archeological Investigations Northwest, Inc. (AINW) and Mr. Keith R. Parker an independent biostatistician. Mr. Ellis is a senior archeologist with AINW and will assist in the assessment of cultural and natural resources for the project; while Mr. Parker will assist in the statistical analyses of data and development of sampling plans.

Should you have any questions or require any additional information, please do not hesitate to contact me at 509-892-2585.